

Law Office of
William G. Royce
1227 West 9th Ave., Ste 200
Anchorage, Alaska 99501
(907) 279-6595
FAX: (907) 278-6488

RECEIVED
FEB 22 2006
CLERK U.S. DISTRICT COURT
ANCHORAGE, ALASKA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SAMSON TUG AND BARGE CO., INC.,)
an Alaskan Corporation)

Plaintiff/Appellant,)

vs.)

UNITED STATES OF AMERICA,)

IN ADMIRALTY
Case No. 3AN-03-006 CV JWS

MOTION FOR OUT-OF-STATE ATTORNEYS
TO APPEAR PRO HAC VICE AND PARTICIPATE IN THIS CASE

COMES NOW the Plaintiff, Samson Tug and Barge, by and through its attorney William G. Royce, and pursuant to United States District Court Local Rule 83.1 (c), hereby moves for an order from this court allowing Richard D. Gluck and Harold G. Bailey, Jr., members in good standing of the bar of the District of Columbia, and duly admitted and licensed to practice as attorneys and counselors at law in the District of Columbia Court of Appeals and all

Motion Pro Hac Vice
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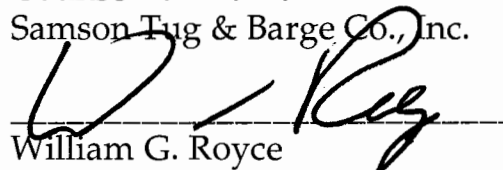
courts of record in that district, to appear and participate in the above captioned action.

The undersigned, a member of the Alaska Bar Association, is authorized to practice in the courts of the state of Alaska, and federal courts in the District of Alaska, the Ninth Circuit Court of Appeals and the United States Supreme Court, and will be associated with the applicants. The undersigned hereby consents in writing to this association. Attached hereto as Exhibits A and B are Certificates of Good Standing as attorneys at law, signed by the Court Clerk at the City of Washington, D.C. for Richard D. Gluck and Harold G. Bailey, Jr.

The original of the enclosed photocopy of check number 5519 in the amount of \$1,100.00, has been paid to the Alaska Bar Association pursuant to Civil Rule 81(2)(d). A copy of the receipt of payment from the Alaska Bar Association is attached.

DATED at Anchorage, Alaska, this 2nd day of February, 2006.

Law Office of William G. Royce
Counsel for Plaintiff
Samson Tug & Barge Co., Inc.


William G. Royce
Alaska Bar No. 7210066

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Certificate of Service

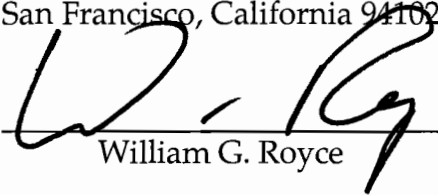
This is to certify that on this
24th day of February, 2006 a
true and correct copy of
plaintiff's:

MOTION FOR OUT-OF-STATE ATTORNEYS
TO APPEAR PRO HAC VICE
and a form of ORDER

was served by first class mail addressed to
the following counsel of record:

Timothy M. Burgess
United States Attorney
Federal Building and U.S. Courthouse
222 West Seventh Avenue, #9, Room 253
Anchorage, Alaska 99513-7567

and Jeanne M. Franken
Trial Attorney
Torts Branch, Civil Division
U.S. Department of Justice
7-5393 Federal Building
P.O. Box 36028
San Francisco, California 94102-3463



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